

# HINSHAW

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October 9, 2007

**VIA FACSIMILE AND ECF**

Hon. Shira A. Scheindlin  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

*Re: Blake v. Ltd Financial Services, L.P.*  
*Docket No. 07 CV 7502 (SAS)(HBP)*

Your Honor:

We represent defendant in the above-referenced litigation and write to respectfully request (1) an adjournment of the initial conference presently scheduled on October 25, 2007 at 4:30 p.m., and (2) a two-week enlargement of time to respond to the Complaint, for the reasons set forth below.

Plaintiff served defendant with a waiver of service of summons, dated August 25, 2007. Accordingly, defendant's response to the Complaint is due on or about October 24, 2007. However, due to a previously scheduled vacation, I am out of the country from October 17, 2007 until October 26, 2007 and regrettably, therefore, will be unable to timely respond to the Complaint as well as appear before the Court at the scheduled conference. Therefore, we respectfully request a two-week enlargement, until November 2, 2007, for the defendant to respond to the Complaint as well as an adjournment of the initial conference date. Counsel for both parties are available to appear before the Court on November 7, 2007 for the initial conference if the Court's schedule so allows. Finally, as settlement discussions have started, the parties hope that the extra time will also serve to enhance the prospects of settlement.

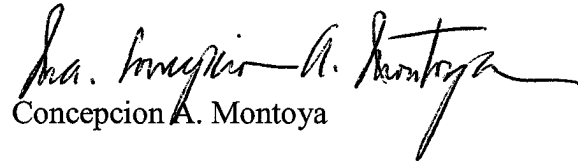
Plaintiff's counsel consents to these requests. No prior requests have been made by defendant.

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We deeply thank the Court for its consideration in this matter.

Respectfully submitted,

HINSHAW & CULBERTSON LLP

  
Concepcion A. Montoya

cc: Shmuel Klein, Esq. (Via Facsimile)